

1 DIANA S. EBRON, Esq.  
2 Nevada Bar No. 10580  
3 Email: diana@kgelegal.com  
4 JACQUELINE A. GILBERT, Esq.  
5 Nevada Bar No. 10593  
6 Email: jackie@kgelegal.com  
7 KAREN L. HANKS, Esq.  
8 Nevada Bar No. 9578  
Email: karen@kgelegal.com  
9 KIM GILBERT EBRON  
10 7625 Dean Martin Drive, Suite 110  
11 Las Vegas, Nevada 89139  
12 Telephone: (702) 485-3300  
13 Facsimile: (702) 485-3301  
14 *Attorneys for SFR Investments Pool 1, LLC*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 BANK OF AMERICA, N.A.,  
18 Plaintiff,  
19 vs.  
20 MADEIRA CANYON HOMEOWNERS'  
21 ASSOCIATION; NEVADA ASSOCIATION  
22 SERVICES, INC.; and SFR INVESTMENTS  
23 POOL 1, LLC,  
Defendants.

24 Case No.: 2:16-cv-00656-RFB-DJA

25 **JOINT STATUS REPORT AND  
26 STIPULATION TO CONTINUE STAY  
27 (SECOND REQUEST)**

28 SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company,  
Counterclaimant/Cross-Claimant,  
vs.  
BANK OF AMERICA, N.A.; and NEIL R.  
KING, an individual,  
Counter-Defendant/Cross-Defendant.

KIM GILBERT EBRON  
7625 DEAN MARTIN DRIVE, SUITE 110  
LAS VEGAS, NEVADA 89139  
(702) 485-3300 FAX (702) 485-3301

**JOINT STATUS REPORT AND STIPULATION TO CONTINUE STAY**

1                   Attorneys for Bank of America, N.A. (“BANA”), SFR Investments Pool 1, LLC (SFR) and  
2 Madeira Canyon Homeowners’ Association (“HOA”), by and through their counsel of record,  
3 stipulate and agree to continue the stay of proceedings for an additional 90 days. In support of this  
4 stipulation, the parties represent as follows:  
5

6                   1. On June 5, 2020, the parties filed a stipulation and order to vacate the dispositive  
7 motion deadline and continue the already existing stay of litigation for 90 days.  
8

9                   2. As part of the stipulation, the parties indicated BANA and SFR had reached a  
10 settlement in principle, which had been executed, but required additional time for SFR to perform  
11 a condition precedent to the settlement.  
12

13                   3. The property in this case is part of a more global settlement between BANA and  
14 SFR, involving a significant number of cases. Due to the COVID-19 pandemic, the parties to the  
15 settlement have agreed to extend the time for performance.  
16

17                   4. The parties therefore agree to continue the stay of proceedings for 90 days. This  
18 will afford BANA and SFR additional time to finalize the settlement without incurring extra  
19 expenses or burdening the court. Additionally, this will allow time for settlement discussion to  
20 continue between BANA and the HOA. The parties are aware of the extended time resolving this  
21 matter has taken and appreciate the court's patience.  
22

23                   5. The parties agree any party may move to lift the stay during the 90 days this matter  
24 is stayed pursuant to this stipulation. The parties further reserve the right to stipulate to lift the  
25 stay during the 90 days the matter is stayed pursuant to this stipulation.  
26

27                   ...  
28                   ...  
29                   ...  
30

KIM GILBERT EBRON  
7625 DEAN MARTIN DRIVE, SUITE 110  
LAS VEGAS, NEVADA 89139  
(702) 485-3300 FAX (702) 485-3301

6. This is the parties' second request for a stipulation to continue the stay of proceedings and is not intended to cause any delay or prejudice to any party.

DATED this 8<sup>th</sup> day of September, 2020.

|  |  |
|--|--|
| <p><b>KIM GILBERT EBRON</b></p> <p><u>/s/ Diana S. Ebron</u><br/> DIANA S. EBRON, ESQ.<br/> Nevada Bar No. 10580<br/> JACQUELINE A. GILBERT, ESQ.<br/> Nevada Bar No. 10593<br/> 7625 Dean Martin Drive, Suite 110<br/> Las Vegas, NV 89139<br/> <i>Attorneys for SFR Investments Pool 1, LLC</i></p>                    | <p><b>AKERMAN LLP</b></p> <p><u>/s/ Holly E. Walker</u><br/> HOLLY E. WALKER, ESQ.<br/> Nevada Bar No. 14295<br/> 1635 Village Center Circle, Suite 200<br/> Las Vegas, NV 89134<br/> <i>Attorneys for The Bank of America, N.A.</i></p> |
| <p><b>LIPSON NEILSON P.C.</b></p> <p><u>/s/ Amber M. Williams</u><br/> J.WILLIAM EBERT, ESQ.<br/> Nevada Bar No. 2697<br/> AMBER M. WILLIAMS, ESQ.<br/> Nevada Bar No. 12301<br/> 9900 Covington Cross Drive, Suite 120<br/> Las Vegas, Nevada 89144<br/> <i>Attorneys for Madeira Canyon Homeowners Association</i></p> |  |

## ORDER

Based on the foregoing stipulation, **IT IS HEREBY ORDERED** that the litigation stay is continued for an additional 90 days. The parties are to file a status report within 90 days of the issuance of this order.

**DATED** this 8th day of September, 2020.

20. 

---

RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE